

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA )  
 ) NO. 2:19-CR-00010  
v. )  
 ) JUDGE CAMPBELL  
GILBERT R. GHEARING )

**NOTICE OF PROPOSED TRIAL DATES AND REQUEST TO SET TRIAL IN  
COOKEVILLE COURTHOUSE**

In accordance with the Court's Order at Docket Entry 179, the United States files its Notice of Proposed Trial Dates. As noted on the record at the Status conference held January 30, 2023, the United States is available for trial in this matter at a time convenient for the Court and the Defendant. As also noted on the record, AUSA Sarah Bogni has a trial in front of Judge Richardson scheduled to begin on March 14, 2023. The United States is open throughout the Spring and Summer of 2023, but would respectfully request a trial date before September 2023, because as represented to Defense counsel in conferring regarding proposed dates, both undersigned counsel have separate trials set in September 2023 in front of Judge Trauger and Judge Crenshaw.

Counsel also respectfully requests that the Court set the trial to be held in the Cookeville Courthouse. In furtherance of this request the United States represents that this case is charged out of the Cookeville Division and the majority of the witnesses the United States intends to call at trial live over two hours from Nashville, and are much closer to Cookeville, Tennessee. During preparation for trial, it became apparent to the United States that traveling to Nashville for trial is extremely burdensome on trial witnesses, who include individuals who are physically vulnerable

and indigent. It is the understanding of the United States that the Defendant also lives closer to Cookeville, Tennessee than to Nashville, Tennessee.

Wherefore the United States respectfully requests a trial date convenient to the Court and Defendant, and requests the Court set the trial to occur in Cookeville, Tennessee.

Respectfully submitted,

HENRY C. LEVENTIS  
United States Attorney for the  
Middle District of Tennessee

/s Sarah K Bogni  
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*Counsel for the United States*

## **CERTIFICATE OF THE SERVICE**

I certify that a copy of the was served electronically, via ECF, this 2nd day February, 2023, upon counsel of record for the defendant.

s/Sarah K Bogni  
SARAH K. BOGNI  
Assistant U.S. Attorney